COMPREHENSIVE STORMWATER MANAGEMENT PLAN

FOR

THE CITY OF LEXINGTON

JUNE 2018

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DEFINITIONS

BMP – Best Management Practice also known as a Stormwater Control Measure

DEMLR – Division of Energy, Mining, and Land Resources

DEQ – Department of Environmental Quality (formerly DENR)

EPA – Environmental Protection Agency

Illicit Discharge – Any discharge to an MS4 that is not entirely composed of stormwater. Exceptions include discharges from NPDES-Permitted industrial sources and discharges from fire-fighting activities

MS4 – Municipal Separate Storm Sewer System. A conveyance or system of conveyances (including roads with drainage systems, municipal streets, catch basins curbs, gutters, ditches, manmade channels, or storm drains)

NPDES – National Pollutant Discharge Elimination System

SCM – Stormwater Control Measure

TMDL – Total Maximum Daily Load

LEXINGTON CITY HALL

Lexington Fire Department HQ

1 STORM SEWER SYSTEM INFORMATION

Population Served: 18,532 (2016 NC Dept. Of Budget & Management)

Annual Growth Rate: -2.1% (2010-2016 NC Dept. Of Budget & Management)

Jurisdictional and MS4 Service Areas: Jurisdictional area: 18.0 square miles,
MS4: _9.5____ square miles

1.1 MS4 CONVEYANCE SYSTEM

The City of Lexington MS4 consists of a combination of storm drain piping, roadside ditches, and sheet flow. New developments are required by City ordinance to have curb and gutter drainage systems except low density projects that can have grass lined drainage ditches and swales. High density developments are required to treat the first 1" of runoff from the developed property. City streets are maintained by the City's Street Department. State roads are maintained and managed by NCDOT.

1.2 LAND USE COMPOSITION ESTIMATES:

Residential:	56%
Commercial:	21%
Industrial:	23%

1.3 ESTIMATE METHODOLOGY:

The land use estimate was based on the City of Lexington GIS Mapping (see City for Update)

1.4 TMDL IDENTIFICATION

Lexington is in the Yadkin- Pee- Dee River Basin

Swearing Creek and Abbots Creek pass within or in the edge of Lexington’s jurisdiction and are listed on the “2014 Category 5 Water Quality Assessments 303(d) List”. However, no TMDLs for these streams have been established at this time.

2 RECEIVING STREAMS

Table 1. Yadkin Pee-Dee River Basin

Receiving Stream Name	Stream Segment	Water Quality Classification	Overall Category	Use Support Rating	Water Quality Issues
Swearing Creek	12-113	C	5	Impaired	3,5
Rat Spring Branch	12-113-5	C	ND	-	-
Tar Creek	12-113-6	C	ND	-	-
North Potts Creek (Michaels Branch)	12-113-3	C	ND	-	-
Abbotts Creek	12-119-(6)b	C	5	Impaired	5
Abbotts Creek	12-118.5	WS-V, B	5	Impaired	3,4,5

All Ratings and Data based on Final 2014 Integrated Report & 2016 303d List published by NC DWQ.

ND - No Data

[1] *Aquatic life and secondary recreation*
[2] *Fish consumption*
[3] *On 303(d) list*
[4] *Fecal Coliform, Copper, Nutrients, Ecological/Biological Integrity of Fish and Benthos*
[5] *Ecological/biological Integrity of Benthos*

3 EXISTING WATER QUALITY PROGRAMS

3.1 LOCAL PROGRAMS:

The City of Lexington is currently implementing an EPA and NCDEQ required NPDES Phase II Stormwater Program.

3.2 STATE PROGRAMS:

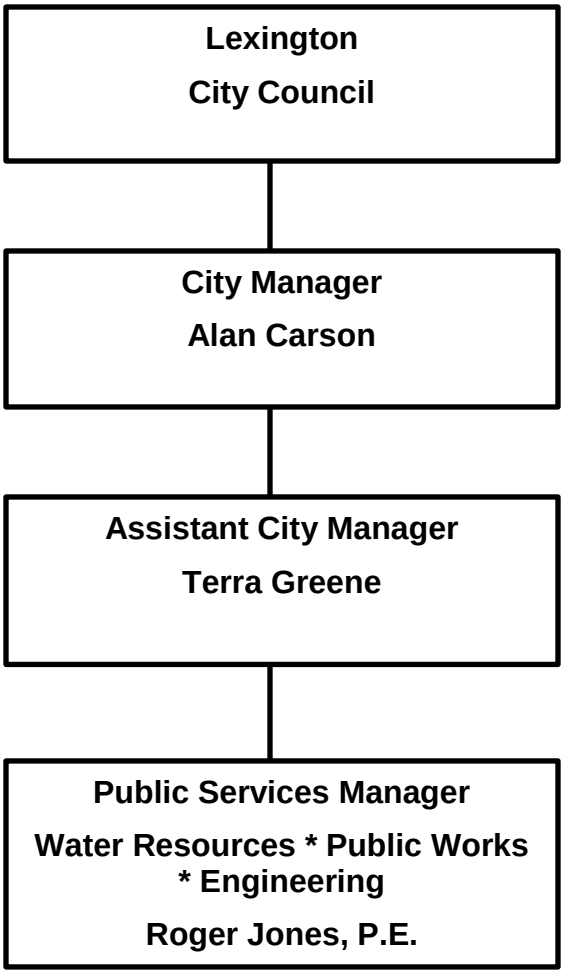
NCDEQ implements the NC Erosion and Sediment Control Program within the City of Lexington.

4 PERMITTING INFORMATION.

Table 2. Responsible Contacts

Position	Name	Phone No.	Fax No.	Email
City Manager	Alan Carson	(336)248-3910		JACarson@LexingtonNC.gov
Assistant City Manager	Terra Greene	(336)248-3910		TAGreene@LexingtonNC.gov
Public Services Manager	Roger Jones, P.E.	(336)-248-3930		RDJones@LexingtonNC.gov
Civil Engineer	Laura Vanhoy	(336)248-3930		llvanhoy@lexingtonnc.gov
Consultant Engineer	Josh Johnson, P.E.	(336) 226-5534	(336) 226-3034	jsjohnson@awck.com

4.2 Organizational Chart



Signing Official: City Manager – Alan Carson

Duly Authorized Representative: NA

5 CO-PERMITTING INFORMATION

Not applicable

6 RELIANCE ON OTHER GOVERNMENT ENTITY TO SATISFY ONE OR MORE PERMIT OBLIGATIONS

The City of Lexington will rely on the State Erosion and Sediment Control Program and the Department of Water Quality's general stormwater permit program for construction activities to meet the construction site stormwater runoff control requirement. There are no legal agreements in place to establish responsibilities.

The City also contracts with the Piedmont Triad Regional Council's Stormwater Smart program. The program handles most of the City's educational responsibilities.

Contact Information:

NC Sedimentation and Erosion Control Program
Winston-Salem Regional Office
Matthew Gantt, P.E. *(status pending)*
450 West Hanes Mill Rd. Suite 300
Winston-Salem, NC 27107-7407
336/776-9800 / 336-776-9654

Piedmont Triad Regional Council
Stormwater Smart
Lindsey Lengyel
1398 Carrollton Crossing Drive, Kernersville, NC 27284
(336) 904-0300

7 STORMWATER MANAGEMENT PROGRAM

7.1 PUBLIC EDUCATION AND OUTREACH ON STORM WATER IMPACTS

7.1.1 BMP Summary Table

BMP	Measurable Goals	YR 1	YR 2	YR 3	YR 4	YR 5	Responsible Position/Party
Set goals and objectives	Set outreach activities goals and report annually.		X	X	X	X	Public Services Manager Civil Engineer Stormwater Smart
Develop an education plan	Develop an education plan. Include in Plan the BMPs, schedule, targeted audiences, and measurable goals. Summarize plan and implementation progress in each annual report.		X	X	X	X	Public Services Manager Civil Engineer Stormwater Smart
School Programs	Provide a school children education program. Focus on basic messages regarding clean water and the things they can do at home to help. Track the number of children reached and the subject covered and report annually.	X	X	X	X	X	Public Services Manager Civil Engineer Stormwater Smart
Identify Target Audience & Target Pollutants	Note target audience and target pollutants in education plan and CWSMP.		X	X	X	X	Public Services Manager Civil Engineer Stormwater Smart
Distribute public education materials to identified target audiences.	Distribute assorted stormwater materials to public. To be done by both City and Stormwater Smart. In year 3, distribute bilingual mailer for insert in utility bills. Target homeowners and businesses with messages about how they can reduce pollution picked up by stormwater. Track number of homes and businesses reached by mailer and report annually.	X	X	X	X	X	Public Services Manager Civil Engineer Stormwater Smart
Information Stormwater Website	Provide a website page on City website and link to other stormwater websites. Give tips on reducing pollution. Report annually.	X	X	X	X	X	Public Services Manager Public Services Administration
Festivals, parades, local fairs	Participate in local festivals annually by providing a stormwater information booth. Provide bilingual messages as necessary on the importance of clean water and on specific activities that can be carried out to help keep stormwater clean.	X	X	X	X	X	Civil Engineer Stormwater Smart

Business and Industry education and outreach	Implement a program for educating business and industry using brochures or pamphlets and report annually on number of businesses reached and number of employees educated. Focus on workplace issues to reduce pollutant loading. Target hot spot businesses.			**X**	**X**		Public Services Manager Civil Engineer Stormwater Smart
Residential education and outreach	Implement a program for educating homeowners. Distribute homeowner's guide to new home buyers.	**X**	**X**	**X**	**X**	**X**	Public Services Manager Civil Engineer Stormwater Smart
Public Contact through Cable Public Access	Advertise Stormwater events and public education through Local Cable Public Access Chanel 13		**X**	**X**	**X**	**X**	Public Services Manager Public Services Administration
Helpline / Hotline (336) 248-3930 – 8-5 am Public Services Adm.	All stormwater related calls will be forwarded to the Public Services Manager who will then distribute the information to other employees.	**X**	**X**	**X**	**X**	**X**	Public Services Manager Public Services Administration

7.1.2 Target Audience

Lexington's primary Stormwater audiences will be the city's residents and school children. The secondary audiences will include local businesses (including gas station owners and landscaping companies) and industry. These will be targeted because these groups have the most impact on stormwater pollution prevention.

7.1.3 Target Pollutant Sources

The education program will target total suspended solids and nutrient loading because turbidity, sedimentation, and nutrients are the pollutants of concern in downstream waters. In addition, floatables, trash, and debris will also be targeted. The education program will also address the proper use and disposal of typical household hazardous wastes such as household chemicals, garden chemicals, and used motor oil.

7.1.4 Outreach Program

School programs, printed materials to be distributed via mail, public events, and participation in state and regionally organized cleanup programs will be used to reach the target audience. By using these methods, the education program will be expected to reach all residents of **Lexington**, as well as those that do business here, over the course of the five year permit period. As a result of this outreach program, the target audience will be informed of the importance of reducing storm water pollution and ways they can incorporate pollution reduction in their daily lives.

Direct Education is used due to availability of the cooperative stormwater education program of Stormwater Smart, additionally mass media can be added with the availability of Local cable access channel 13.

7.1.5 Decision Process

The formation of the storm water public education and outreach program will be based on the mechanisms currently in place, and their means and effectiveness of communicating and educating the public about the issues of stormwater pollution prevention. Each of the BMP's selected will be judged to be an effective and economical tool for educating the general public and/or specific groups within the community, with a specific measurable goal with which to gauge its effectiveness.

7.1.6 Evaluation

The education and outreach program will be evaluated based on how each individual BMP is meeting its measurable goal at the end of each reporting period. Changes will be considered for any BMPs that are not meeting the measurable goals.

7.2 PUBLIC INVOLVEMENT AND PARTICIPATION

7.2.1 BMP Summary Table

BMP	Measurable Goals	YR 1	YR 2	YR 3	YR 4	YR 5	Responsible Position/Party
Mechanism for Public Involvement	A public meeting will be held annually to discuss the stormwater permit. This meeting will provide the public with the opportunity to be involved with the stormwater program and will serve as a better conduit for public input than the stormwater committee used previously. More meetings may be held if public involvement is substantial.		X	X	X	X	Public Services Manager Civil Engineer
Volunteer Stormwater Program	The City will promote various volunteer stormwater programs annually. These may include Big Sweep, Adopt-A-Stream programs, Brown Cart Recycling Program and Storm Drain Stenciling. The number of participants will be reported annually.	X	X	X	X	X	Public Services Manager Civil Engineer Stormwater Smart
Helpline / Hotline (336)248-3930 – 8-5 am Public Services Adm.	All stormwater related calls will be forwarded to the stormwater hotline/helpline who will then distribute the information to other employees.	X	X	X	X	X	Public Services Manager Public Services Administration

7.2.2 Target Audience

A Public meeting was held prior to year one and the City will hold an annual public meeting rather than trying to solicit stormwater committee members. The public meetings will allow the public an opportunity to review the stormwater management program and will target all interested and affected members of the Lexington community. Additional meetings may be held if public involvement is substantial.

7.2.3 Participation Program

The public was originally involved in the development of the stormwater permit and management program through a public hearing. Public participation opportunities will be implemented throughout the life of the permit through the Volunteer Stormwater Programs and the Annual Public Meeting.

7.2.4 Decision Process

A public meeting is necessary for public participation and input. The other BMPs were selected to give the public a choice of both active and passive participation roles.

7.2.5 Evaluation

The Public Involvement and Participation program will be evaluated based on how each individual BMP is meeting its measurable goal at the end of each reporting period. Changes will be considered for any BMPs that are not meeting the measurable goals.

7.3 ILLICIT DISCHARGE DETECTION AND ELIMINATION

7.3.1 BMP Summary Table

BMP	Measurable Goals	YR 1	YR 2	YR 3	YR 4	YR 5	Responsible Position/Party
Verify / Review adequate legal authorities	Review Illicit Discharge Ordinance and make any necessary revisions.	X			X		City Attorney Public Services Manager Civil Engineer
Review Illicit Discharge Program	Review Illicit Discharge Program and make any necessary revisions.		X		X		Public Services Manager Civil Engineer
Storm sewer system map showing outfalls and the receiving body of water previously completed.	Maintain system map in support of inspection program. The map will note outfalls and receiving body of water for each outfall. Report annually on progress.	X	X	X	X	X	Civil Engineer
Investigate sources of identified illicit discharges	Develop written procedures for how to investigate illicit discharges.		X	X	X	X	Public Services Manager Civil Engineer Public Services Administration
Track and document illicit discharges and their investigations	Document illicit discharge investigations through paperwork and within the MS4 Map.	X	X	X	X	X	Civil Engineer
Train employees on how to inspect for illicit connections and establish a tracking system for managing reported problem areas.	Provide materials to all public employees in illicit connections and how to recognize one. Summarize in annual report.		X	X	X	X	Public Services Manager Civil Engineer
Dry Weather Flow Detection	Dry Weather testing will be done at least bi-annually in accordance with the IDDE program, dependent upon other IDDE investigations.			X	X	X	Civil Engineer
Public reporting mechanism Helpline / Hotline (336) 248-3930 – 8-5 am	All stormwater related calls, overflows, failed septic systems will be forwarded to PSA Team and then to the Public Services Manager who will then distribute the information to other employees.		X	X	X	X	Public Services Manager Public Services Administration

7.3.2 Storm Sewer System Map

Storm sewer system has been mapped and will be inspected during the course of normal maintenance operations by the Street Department. The route of the system, locations of pipes, drainage ditches, and outfalls will be maintained on a paper map and/or electronic map. The map will be updated as needed during subsequent maintenance operations.

7.3.3 Regulatory Mechanism

The City has an Illicit Discharge Ordinance which allows for inspection, maintenance, and prohibits illicit discharges.

7.3.4 Enforcement:

There are provisions in the amended ordinance for enforcement actions and penalties for dumping, spills, and willful illicit connection.

7.3.5 Detection and Elimination

After the field screening is complete, the City will take measures to identify and remove illegal discharges. Identifying illegal discharges may require a combination of office and field work. After the site visit and field observation, staff will consult the jurisdiction-wide information they have compiled to obtain information about the land uses, infrastructure, industries, potential sources and types of pollution that may exist in the drainage area of the outfall.

After priority areas have been identified in the office, a systematic field investigation will be planned that minimizes the amount of resources required to identify the source. The following field methods may be used to identify and trace the source of illegal discharges:

- Site Investigation
- Dry weather flow observations
- Smoke Testing/Dye Testing
- Television Inspection

The right of entry established in the ordinance will provide access for inspection if the origin of the discharge is in doubt. Once an illegal discharge is located and confirmed through field screening, staff will notify the responsible party verbally if possible and follow-up with written notification. If the responsible party does not comply with the removal schedule provided by the City, or receive approval for a revised schedule, the City will take enforcement action and the discharge or connection will be removed at the responsible party’s expense.

7.3.6 Non Stormwater Discharges

Currently there are no known non-stormwater discharges that are a significant contributor to the MS4. If any are identified in the future, they will be addressed at that time.

7.3.7 Outreach

City employees will be informed of the hazards associated with illegal discharges and improper disposal of waste as part of their general training requirements. These will be addressed in the Pollution Prevention/Good Housekeeping section of this plan, and will include training in hazardous material handling and disposal, as well as notices and signs posted in the appropriate areas.

The general public will be educated through the BMP's listed in the Public Education section of this plan. These educational BMP's will include brochures, public service announcements, and business education and outreach programs.

7.3.8 Decision Process

The formation of the storm water Illicit Discharge Detection and Elimination program was based primarily on regulatory mechanisms. The regulatory, educational, procedural BMP's selected were judged to be an effective means of detecting and eliminating illicit discharges.

7.3.9 Evaluation

The effectiveness of the program will be gauged by the total number of illicit connections detected and removed each year and with public complaints. If the total number remains constant, or increases, changes will be made to the public education program and/or the City ordinance to allow for greater enforcement and penalties.

7.4 CONSTRUCTION SITE STORMWATER RUNOFF CONTROL

The City of Lexington will rely on the North Carolina State Erosion and Sediment Control Program and the Department of Water Resource's general stormwater permit program for construction activities to meet the construction site stormwater runoff control requirement.

7.5 POST-CONSTRUCTION STORM WATER MANAGEMENT IN NEW DEVELOPMENT AND REDEVELOPMENT

7.5.1 BMP Summary Table

BMP	Measurable Goals	YR 1	YR 2	YR 3	YR 4	YR 5	Responsible Position/Party
Review Adequate Legal Authority	Review the Post Construction Ordinance for compliance with NC DEQ guidance and local effectiveness.		X		X		City Attorney Public Services Manager Civil Engineer
Review standards and policies that ensure structural BMPs will be in conformance with the state's Stormwater Management Design Manual	Review local standards to remain in compliance with the NC DEQ-WR- BMP Manual. Additional measures and techniques may be added to the local ordinance as they are investigated.	X	X	X	X	X	Public Services Manager Civil Engineer
Plan Reviews	Review plans that qualify within the City's Post Construction Ordinance within the City's TRC format.		X	X	X	X	Civil Engineer Consultant Engineer
Review maintenance standards and inspection program to ensure that on-site controls continue to function as designed.	Review the maintenance standards and inspection program for local on-site controls.		X		X		Public Services Manager Civil Engineer
Develop an education program created for land developers and the public.	Develop an education program created for land developers and the public detailed in other BMP's.		X		X		Public Services Manager Civil Engineer / Stormwater Smart
Provide/Maintain Inventory of post construction stormwater control measures	Maintain a list of stormwater control measures, a map of stormwater control measures, and a file of stormwater reviews and approvals		X	X	X	X	Civil Engineer
Inspections of stormwater control measures	Maintain a list of inspection reports on approved and built stormwater control measures.		X	X	X	X	Public Services Manager Civil Engineer
Green Infrastructure Practices and Strategies will be encouraged.	Green Infrastructure Practices and Strategies will be encouraged and existing standards may be eased to encourage green projects.			X	X	X	Public Services Manager City Planner
Enforcement	Notices of violations and enforcement actions will be tracked. To give the ability to identify chronic violators to initiate actions to reduce noncompliance.			X	X	X	City Attorney Public Services Manager Civil Engineer

7.5.2 Stormwater Management Options

The existing land usage ordinance has a post-construction stormwater runoff management program for new development and redevelopment projects that disturb greater than, or equal to, one acre.

7.5.3 Non-Structural BMP's

The receiving streams in the City's watershed are classified as Nutrient Sensitive Waters; therefore the post construction ordinance ensures that best management practices for reducing nutrient loading are implemented.

7.5.4 Structural BMPs

The City has certified its BMP manual as equal to the NC DWQ BMP Manual. The City reviews structural BMP's based on the NC DWQ BMP Manual and will continue to do so in the future. The City may investigate additional qualified BMP's in the future. These additional techniques are to be evaluated based upon field testing and evaluation by the city's engineer.

7.5.5 Regulatory Mechanism

The City's Post-Construction Ordinance establishes the City's authority to regulate new development for water quality compliance.

7.5.6 Operation and Maintenance

The City's Post-Construction Ordinance establishes the City's authority to regulate new development for water quality compliance. The ordinance includes guidelines for delegating routine and non-routine maintenance responsibilities to ensure access for inspections, and providing a mechanism for enforcement.

The City will require annual submissions of BMP inspection reports and the City will inspect each BMP during each permit cycle.

7.5.7 Education

An education process for developers and citizens about new development with respect to stormwater and water quality has been established and is ongoing.

7.5.8 Decision Process

The post-construction stormwater management program ensures that controls are in place that will prevent or minimize water quality impacts from new development and redevelopment projects. These controls include post-construction ordinance to address post-construction runoff control from new development and redevelopment projects and ensure adequate long-term operation and maintenance of BMPs. Future revisions to this ordinance will be intended to enhance water quality.

7.5.9 Evaluation

The post-construction site management for new and re-development activities program will be evaluated based on how each individual BMP is meeting its measurable goal at the end of each reporting period. Changes will be considered for any BMPs that are not meeting the measurable goals.

7.6 POLLUTION PREVENTION/GOOD HOUSEKEEPING FOR MUNICIPAL OPERATIONS

7.6.1 BMP Summary Table

BMP	Measurable Goals	YR 1	YR 2	YR 3	YR 4	YR 5	Responsible Position/Party
Complete environmental audit of all identified municipal facilities and prioritize recommendations for addressing potential pollution prevention activities. Annually inspect all municipal facilities to identify potential for polluting stormwater.	Begin environmental audits at priority sites and complete all audits by Year two. Prioritize recommendations, as each audit is completed and initiate recommendations in the fiscal year following recommendations. High hazards will be addressed immediately. Objective is to reduce pollutant loading from municipal sites.			X	X	X	Public Services Manager Civil Engineer
Map Municipally owned or operated facilities.	Identify and Map Municipally –owned or operated facilities. The map will identify the stormwater outfalls and receiving waters of each facility to which these facilities discharge. Maintain updated map.			X	X	X	Public Services Manager Civil Engineer
Spill Response Procedures	Maintain a Spill Response Procedure		X	X	X	X	Public Ser. Mgr./ Civil Engineer
Streets, Roads, and Public Parking Lots Maintenance Program	Evaluate and select BMP's by end of year 2, implement BMP's by end of year 3. Evaluate Annually for cost and effectiveness.		X	X			Public Services Manager Civil Engineer
O&M for municipally owned or maintained catch basins and conveyance systems	Implementation of the O&M Program for the MS4, including catch basins and conveyance systems. Reassess program annually.			X	X	X	Public Services Manager Civil Engineer
O&M & list for municipally-owned or maintained structural stormwater controls	Implement and maintain an O&M Program for municipally-owned or maintained structural stormwater controls. Municipally owned SCM's are listed along with other structural SCM's.			X	X	X	Public Services Manager Civil Engineer
Pesticide, Herbicide and Fertilizer Application Management	Ensure municipal employees and contractors are properly trained and all permits, certifications, and other measures for applicators are followed.	X	X	X	X	X	Public Services Manager Civil Engineer
Staff Training	Implement an employee training program for employees involved in pollution prevention and good housekeeping practices.		X	X	X	X	Public Services Manager Civil Engineer
Vehicle Washing	Implement measures to minimize or prevent contamination of stormwater runoff from all areas used for vehicle and equipment cleaning.			X	X	X	Public Services Manager Civil Engineer

7.6.2 Affected Operations

The City of Lexington has Streets, Recycling & Waste, Fleet, Recreation/Public Grounds, Golf, Public Buildings, Warehouse, Gas, Electric, Public Works M & C, Waste Treatment Plant, Water Treatment Plant, Police and Fire Department buildings.

7.6.3 Training

Training materials have been developed on pollution prevention for public facilities, using similar materials as will be used in the public outreach program. All employees are educated on the need for controls to protect stormwater from exposure to potential pollutants. This training also serves as the training requirement for public employees as specified in the outreach component of the Illicit Discharge section of this program.

All public employees involved in vehicle, open space, or building maintenance operations will be provided training in BMPs, the processes and materials they are working with, safety hazards, practices for preventing discharges, and procedures for responding quickly and properly to toxic and hazardous material incidents.

All public employees involved in stormwater drainage system maintenance will be specifically trained in the disposal of floatables, grit, sediment, and other pollutants removed from the system. Additional training will be provided to employees that manage and apply chemicals for control of dust, pests, vermin and weeds and or to enhance the growth or condition of public urban and recreational landscape and recreational facilities. Training will target the safe and effective application, storage and disposal of the chemicals used.

7.6.4 Maintenance and Inspections

A preventive maintenance program will be developed that includes routine inspections of catch basins and other stormwater systems for the municipal building and vehicle storage yard. The objective of the inspections is to reduce pollutant loading from municipal sites. Inspections include noting any problems or issues that may have an impact on stormwater quality, and any corrective actions needed. Schedules, procedures, and a record-keeping system are used to schedule and document inspections.

7.6.5 Vehicular Operations

All vehicles, equipment, and associated material at all Department will need to be maintained. Washing of vehicles will be performed in a designated wash areas where runoff can be properly managed to prevent stormwater pollution. Minor vehicle and equipment maintenance take place at these facilities.

7.6.6 Waste Disposal

Debris and floatables collected from the MS4 are currently transferred to multiple sites. Disposal of the material will be investigated in year two and addressed within the five year permit cycle. The City of Lexington performs its own garbage, yard waste, recyclables and heavy trash collection. Used oil from vehicle and equipment maintenance operations is stored onsite and periodically collected by a certified oil recycler.

7.6.7 Flood Management Projects

Future flood management projects will be reviewed from a water quality standpoint.

7.6.8 Decision Process

The most effective and practical BMPs for minimizing stormwater pollution were selected for this program.

7.6.9 Evaluation

The pollution prevention/good housekeeping for municipal operations program will be evaluated based on how each individual BMP is meeting its measurable goal at the end of each reporting period. Changes will be considered for any BMPs that are not meeting the measurable goals.

7.7 TOTAL MAXIMUM DAILY LOADS (TMDL)

7.7.1 BMP Summary Table

BMP	Measurable Goals	YR 1	YR 2	YR 3	YR 4	YR 5	Responsible Position/Party
Establish if a TMDL exists on a receiving water of the MS4	Verify TMDL's annually.		X	X	X	X	Public Services Manager Civil Engineer
Water Quality Recovery Program	If a TMDL is determined to exist, evaluate TMDL and establish Water Quality Recovery Program in accordance with the permit.		X	X	X	X	Public Services Manager Civil Engineer

7.7.2 Determination of TMDL's

A TMDL on a receiving water with a stormwater Waste Load Allocation (WLA) will trigger the need for compliance with this section of the CSWMP. A TMDL with no WLA will not require a Water Quality Recovery Plan, but rather the need to evaluate existing strategies and if any can be tailored or expanded to improve the water quality in the TMDL watershed.

7.7.3 Establishing a Water Quality Recovery Plan

Based on the above schedule the City of Lexington would begin creating a Water Quality Recovery Plan (WQRP) within 12 months of establishment of the TMDL, would have evaluated existing measures within 24 months, developed a monitoring plan within 36 months, and would be implementing or have planned for implementation within 48 months. The WQRP would be submitted and approved by NC DEQ and EPA.

7.7.4 Decision Process

TMDL planning and implementation will be done in an effort to improve water quality and with the approval of NC DEQ staff.

7.7.5 Evaluation

Progress toward restoring water quality standards will be difficult to determine and most evaluation tools will be based upon programs rather than through water quality monitoring or water quality improvements. While the goal of a WQRP is to improve water quality standards, the NPDES MS4 permit obligation is to reduce non-point source pollutant loading to the maximum extent practicable (MEP). The MS4 is not required to meet water quality standards. Evaluation of successful techniques will be evaluated over time, probably multiple permit cycles.